

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

In re:	PROMESA Title III
THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,  as representative of  THE COMMONWEALTH OF PUERTO RICO, <i>et al.</i>	Case No. 17 BK 3283-LTS (Jointly Administered)
Debtors. <sup>1</sup>	
In re:  THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO  as representative of  PUERTO RICO ELECTRIC POWER AUTHORITY,  Debtor.	PROMESA Title III  Case No. 17 BK 4780-LTS
THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, as representative of PUERTO RICO ELECTRIC POWER AUTHORITY, and PUERTO RICO FISCAL AGENCY AND FINANCIAL ADVISORY AUTHORITY,  Movants, v.  OFFICIAL COMMITTEE OF UNSECURED CREDITORS, <i>et al.</i> Respondents.	<b>This Court Filing Relates Only to Case No. 17-BK- 4780-LTS</b>

<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the "Commonwealth") (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA", and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the "Debtors") (Bankruptcy Case No. 19-BK-5532-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

**URGENT MOTION OF ALL PARTIES TO ENTER A CORRECTED  
FIFTH REVISED ORDER EXTENDING AND ESTABLISHING CERTAIN  
DEADLINES APPLICABLE TO THE JOINT MOTION OF PUERTO RICO ELECTRIC  
POWER AUTHORITY AND AAFAF PURSUANT TO BANKRUPTCY CODE  
SECTIONS 362, 502, 922, AND 928, AND BANKRUPTCY RULES 3012(A)(1) AND 9019  
FOR ORDER APPROVING SETTLEMENTS EMBODIED IN THE RESTRUCTURING  
SUPPORT AGREEMENT [ECF NO. 1235]**

To the Honorable United States District Judge Laura T. Swain:

The Puerto Rico Electric Power Authority (“PREPA”), by and through the Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), as the Debtors’ representative pursuant to section 315(b) of the Puerto Rico Oversight, Management, and Economic Stability Act (“PROMESA”), the Puerto Rico Fiscal Agency and Financial Advisory Authority (“AAFAE,” and together with PREPA and the Oversight Board, the “Government Parties”), The Official Committee of Unsecured Creditors (the “UCC”), Cortland Capital Market Services LLC, as Administrative Agent (“Cortland”), SOLA LTD, Solus Opportunities Fund 5 LP, Ultra Master LTD, and Ultra NB LLC (collectively, “Solus” and together with Cortland, the “FLL”), Unión de Trabajadores de la Industria Eléctrica y Riego (“UTIER”), and Sistema de Retiro de los Empleados de la Autoridad de Energía Eléctrica (“SREAAE,” together with the UCC, the FLL, and UTIER, the “Anticipated Objectors”)<sup>2</sup> (collectively, the “Parties”) respectfully submit this urgent joint motion (the “Urgent Motion”) with the attached proposed order in connection with the *Joint Motion of Puerto Rico Electric Power Authority and AAFAF Pursuant to Bankruptcy Code Sections 362, 502, 922, and 928, and Bankruptcy Rules 3012(a)(1) and 9019 for Order Approving Settlements Embodied in Restructuring Support Agreement* [the “RSA”] and

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<sup>2</sup> In referring to the Anticipated Objectors, the Government Parties do not concede that any Anticipated Objector has standing to object to the 9019 Motion or to intervene in this contested matter. The Fee Examiner has also indicated that he is considering filing an objection. The Government Parties do not anticipate that U.S. Bank National Association as the PREPA Bond Trustee will oppose the 9019 Motion, but it has reserved all rights relating to the 9019 Motion at this time. The Government Parties reserve their rights to oppose participation by any of these entities, as appropriate.

*Tolling Certain Limitations Periods* (ECF No. 1235 in Case No. 17-4780). A copy of the proposed order is attached hereto as **Exhibit A** (the “Proposed Order”).

The Parties are submitting herewith a corrected version of *[Proposed] Fifth Revised Order Modifying Certain Deadlines Applicable to the Joint Motion of Puerto Rico Electric Power Authority and AAFAF Pursuant to Bankruptcy Code Sections 362, 502, 922, and 928, and Bankruptcy Rules 3012(A)(1) and 9019 for Order Approving Settlements Embodied in the Restructuring Support Agreement* (the “Original Proposed Order”) (ECF No. 1664 in Case No. 17-4780), which the Court recently entered (ECF No. 1667 in Case No. 17-4780). An additional edit, agreed to by all Parties, was inadvertently left off the Original Proposed Order. A blackline comparison of the Original Proposed Order and the corrected Proposed Order is attached hereto as **Exhibit B**. The Parties respectfully request the Court enter the Proposed Order attached as Exhibit A, superseding ECF No. 1667 in Case No. 17-4780.

\* \* \*

**Certification of Compliance with  
Local Rule 9013-1 and the Tenth Amended Case Management Procedures**

Pursuant to Local Rule 9013-1 and ¶ I.H of the *Tenth Amended Notice, Case Management and Administrative Procedures*, the undersigned counsel hereby certify they have (a) carefully examined the matter and concluded there is a true need for an urgent extension; (b) not created the urgency through any lack of due diligence; and (c) made reasonable, good-faith communications in an effort to resolve or narrow the issues that are being brought to the Court.

*[Remainder of Page Intentionally Left Blank]*

Dated: October 17, 2019

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**CERTIFICATE OF SERVICE**

I hereby certify that, on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notifications of such filing to all CM/ECF participants in this case.

*/s/ Luis F. del Valle-Emmanuelli*  
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